

December 4, 2012

1 – 2 pm

FFSEP Phase 2 Kickoff meeting

Attendees:

R1 – Meghan Cassidy (primary), Martha Bosworth

R2 – Helen Shannon (primary)

R3 – Elizabeth Olhosso, not present Joe Vitello (primary)

R4 – Cathy Amoroso (primary)

R5 – Mike Chrystof (primary)

R6 – Philip Ofosu (primary)

R7 – not present Todd Davis (primary?)

R8 – Ryan Dunham (primary)

R9 – Debbie Schechter, Bob Carr, not present Leslie Ramirez (primary)

R10 – Ken Marcy (primary)

FFRRO – Dawn Taylor (on detail from R4), Heather Njo (on detail from R3), Steve Tzhone (on detail from R6), Mary Cooke, Charlotte Bertrand, Reggie Cheatham

OSRTI – Doug Ammon

The initial discussion began with a conversation about the purpose of Phase 2, especially as it relates to the NFRAP universe of sites. FFRRO's intent is to identify those sites that may need "another look" to determine if the NFRAP determination still holds. The intent IS NOT to reassess all of the NFRAP sites, only identify those that the Regions MAY want to consider for reassessment. The following points were made:

- OCA was not a "choice" for sites in the early years of the program, so there may be NFRAP sites where it may now be more appropriate (especially for transparency to the public) to code as OCA
- There are a number of criteria that may have changed since the original NFRAP decision was made that may indicate a possible need for reassessment of the site. This may include, but is not limited to, population changes, changes in sources of drinking water, land use changes, potential Vapor Intrusion concerns, changes to SCDM values, changes in toxicity and mobility of contaminants

It was noted that OSRTI has already started an effort to increase transparency regarding the OCA sites and Federal Facility sites are a part of that effort -

http://www.epa.gov/superfund/programs/npl_hrs/othercleanup.htm

The Regions plan to check in with the states on an annual basis to ascertain that the OCA sites in each state are progressing adequately under the state's authority and find out if the states need any assistance. FFRRO would like to consider taking this effort a little further and develop a process to be able to document those "check-ins" in CERCLIS/SEMS (possibly akin to the 5 year review 6- month follow-ups). This will need to be discussed and evaluated further before proceeding.

FFRRO discussed the proposed schedule and a need to develop a step-wise systematic process for evaluating the universe of sites.

STEP 1 – Initial Data Collection/Screening

Lead: FFRRO (via contractor)

The first step is for HQs FFRRO to have the contractor conduct an evaluation (initial screening) of what information is currently available in CERCLIS and SDMS. Several Regions indicated that many of the files for these sites are not in SDMS, but rather in archives in warehouses. FFRRO expects to receive the screening deliverable from the contractor in early January 2013 and will share that with the group so we can determine how to proceed forward.

STEP 2 – Selection of Test Case Sites

Lead: FFRRO with Regional input on final list of test case sites

Once we have the “lay of the land”, FFRRO will identify a small random (yet representative) subset of the entire universe (40 sites) to have the contractor do some extended research on.

Action Items:

1. Identify criteria for picking test cases and identify test case sites – subset should include sites that represent all Regions, all federal agencies and represent various points in time.

Note: Prior to finalizing the final list of 40 test case sites, FFRRO will consult with Regions to ensure that there are no “issues” from a Regional perspective with selecting these sites as test cases

STEP 3- Information Collection for Test Case Sites

Lead: Workgroup (FFRRO, OSRTI, Regions)

[Note: FFRRO Contractor will conduct actual evaluation/research based on variables agreed upon by the Workgroup]

FFRRO Contractor will conduct research and evaluation of 40 test case sites.

Action Items:

1. Identify sources of information (some suggestions include CERCLIS, SDMS, site files, state websites, federal websites, Google earth, EJScreen and other publically available info (new articles, etc.)); consider using enforcement authority via 104e letters to other federal agencies

2. Identify information we want collected on the test case sites

Some suggestions include:

- Date of NFRAP or OCA decision
- Type of media contaminated
- Type of contaminant(s)
- Source of contamination
- Current population within 1 mile radius
- Current water supply source(s) within 1 mile radius
- Current land use within one mile radius (primarily residential, primarily industrial, primarily recreational, etc.)
- Number of schools within 1 mile radius
- Number of day care facilities within 1 mile radius
- Current status of cleanup/investigation (if any) at site and responsible party (state, locals, feds, etc) taking the action (if any) and date associated with most recent known activity
- past annual environmental expenditures by responsible party for cleanup/investigation as well as any planned future expenditures by other federal agency at the sites

- is there a potential threat to drinking water intake
- proximity to fishery
- proximity to sensitive environment
- proximity to sensitive population
- located in a well-head protection area
- known or suspected release vs. no suspected release
- OTHERS?

STEP 4 – Evaluate/Categorize/Prioritize Test Case Sites

Lead: Workgroup (FFRRO, OSRTI, Regions)

Use the information gathered on the test case sites categorize/prioritize sites

ACTION ITEMS:

1. **Determine** categories of “bins” of sites (hot, warm, cool, and cold?)
 2. Determine criteria to use for prioritization. Probably should consider using those criteria that may have potential to significantly impact HRS score. May want to consider binning by site type category, types of contaminants
- can we use the knowledge of what sites receive IRP or DERP funding to help categorize sites?

STEP 5 – Information Collection for Remaining Universe of Sites

Lead: FFRRO and FFRRO contractor

Expand what was learned from test cases exercise to entire universe of sites (using HQs contractor resources). As information is gathered, it will be provided to the Regions with a suggested “bin” category and then the Region may follow-up as they see fit.

STEP 5

Lead: Regions with assistance from FFRRO, if needed

If the information collected gives the Region the weight of evidence that a NFRAP decision may no longer be appropriate at a site or that an OCA site may not be making adequate progress or may require EPA assistance, then the Region may consider a Reassessment of the sites.

OPTIONS

1. EPA indicates to Other Federal Agency that we have a weight of evidence to indicate that a site needs to be reevaluated and the Other Federal Agency conducts a reassessment voluntarily
2. EPA enters into an agreement with the Other Federal Agency to reimburse EPA to conduct the reassessment
 - there were some concerns about potential contractual issues with this option, but FFRRO does not think that will be a problem; there is also the possibility of funding the states to conduct the work for the other federal agency

OTHER DISCUSSION POINTS

1. Need to set up separate call to discuss follow-up to Phase 1 of FFSEP
2. Dawn will resend the universe of OCA and NFRAP sites out to the group again
3. Dawn will set up next call for week of January 7th